UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

iRACING.COM MOTORSPORT SIMULATIONS LLC,)	
a Delaware Limited Liability Company, Plaintiff)	
)	
V.)	Civil Action No
)	05-11639 NG
TIM ROBINSON, individually and d/b/a)	
www.ow-racing.com and www.torn8oalley.com,)	
Defendant)	

JOINT PROPOSED SCHEDULE

Pursuant to the Court's directive at the December 14, 2005 Status Conference, the parties jointly propose the following schedule for the Court's approval:

Motion to Dismiss:

Jan 10	Defendant to file Motion to Dismiss and supporting materials
Feb 07	Plaintiff file Opposition to Motion
Feb 16	Hearing on Motion (3:00 p.m.)

Additional Document Production:

Dec 28	Defendant serve written response to numbered paragraphs of Plaintiff's Dec 13, 2005 letter
Jan 10	Defendant produce files per its December 28 written response
Jan 17	Plaintiff file Motion to Compel, if not satisfied with production
Feb 07	Defendant file Opposition to Motion to Compel
Feb 17	Hearing on Motion, with Motion to Dismiss (3:00 p.m.)

By their attorneys,

/s/ Irwin Schwartz

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